


Individual Income Tax Return (Form 1040), for calendar year 2015, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which Defendant did not believe to be true and correct as to every material matter, in that as she then and there well knew and believed, the return understated her business income on line 12 by failing to report income Defendant had that year, and she knew that in fact her reported total income was false and that her actual total income substantially exceeded the amount reported.

In violation of Title 26, United States Code, Section 7206(1).

MICHELLE M. BAEPLER
First Assistant United States Attorney

By: 
MICHAEL L. COLLYER, Chief
White Collar Crimes Unit